

3. The Defendant submitted the monthly contribution reports but failed to submit the ERISA contributions shown to be owed in the amount of \$17,850.88 for the months of November 2011 and March 2012. The Defendant also failed to remit the union dues it withheld from the employees' wages. The amount of dues withheld is \$1,067.77 for the period November 2011 and March 2012, Exhibit B, affidavit of John Libby.

4. The Defendant owes interest on the unpaid ERISA contributions in the amount of \$528.50 pursuant to the Trust Agreements and 29 U.S.C. §1132(g)(2)(B). (Exhibit B)

5. The Defendant owes liquidated damages on the unpaid ERISA contributions in the amount of \$5,811.15 for the period September 2011 through March 2012 pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(ii). (Exhibit B)

6. The Defendant owes the sum of \$4,041.25 for necessary and reasonable attorney fees and costs of \$405.00 which are collectible under the terms of the Agreed Order, Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). (Exhibit C, affidavit of Daniel P. McAnally)

WHEREFORE, Plaintiffs pray that their motion for entry of judgment be granted in the amount of **\$29,704.55**.

Respectively submitted,

s/ DANIEL P. McANALLY
Attorney for Plaintiffs

Whitfield McGann & Ketterman
111 E. Wacker Drive
Suite 2600
Chicago, IL 60601
312.251.9700